



Patrick W. Turner
General Counsel-South Carolina
Legal Department

AT&T South Carolina
1600 Williams Street
Suite 5200
Columbia, SC 29201

T: 803.401.2900
F: 803.254.1731
patrick.turner.1@att.com
www.att.com

December 15, 2008

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: dPi Teleconnect, L. L. C. v. BellSouth Telecommunications, Inc. d/b/a
AT&T South Carolina
Docket No. 2008-160-C

Dear Mr. Terreni:

I am writing to inform the Commission and the parties of the status, from AT&T South Carolina's perspective, of the various motions that are set for Oral Argument in this docket on January 8, 2009.

1. AT&T South Carolina's Motion to Compel (Requests 12a, 17, 18, 19 and Requests 6, 7b, 12b, and 21).¹

dPi has provided AT&T South Carolina with supplemental responses to these Requests. In light of these supplemental responses, and subject to its right to serve additional discovery to clarify certain responses, AT&T South Carolina withdraws its Motion to Compel to the extent that it addresses these specific Requests.

¹ These Requests are addressed in Sections I.A and I.B of AT&T South Carolina's Motion to Compel.

2. AT&T South Carolina's Motion to Compel (Requests 9-11, 13-16, and 20).²

dPi has not provided AT&T South Carolina with supplemental responses to these Requests in this docket. However, dPi has answered these Requests, subject to objection, in the companion North Carolina proceeding. If dPi provides these same answers to these Requests (subject to the same objections) as it provided in the North Carolina proceedings, AT&T South Carolina will withdraw its Motion to Compel to the extent that it addresses these specific Requests. Otherwise, AT&T South Carolina intends to argue its Motion to Compel with regard to these Requests during the upcoming Oral Argument.

3. AT&T South Carolina's Motion to Limit dPi's use of Documents in these Proceedings.

As noted above, dPi has provided supplemental responses to a number of Requests in this docket. At this time, and subject to its right to serve additional discovery to clarify certain responses, AT&T South Carolina is unaware of any deficiencies in these responses. AT&T South Carolina, however, wishes to preserve its rights to object to dPi's use of any documents that are responsive to any of AT&T South Carolina's Requests and that have not been produced. In order to avoid any argument that AT&T South Carolina has waived its right to do so by withdrawing this Motion, AT&T South Carolina respectfully requests that the Commission hold this Motion in Abeyance.

4. dPi's Motion to Strike Defense

AT&T South Carolina opposes this motion and stands ready to address it during the upcoming Oral Argument.

By copy of this letter, I am serving all parties of record with a copy of this pleading as indicated on the attached Certificate of Service.

Sincerely,



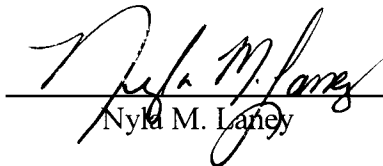
Patrick W. Turner

PWT/nml
cc: All Parties of Record
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² These Requests are addressed in Section I.C of AT&T South Carolina's Motion to Compel.

Christopher Malish, Esquire
Steven Tepera, Esquire
Foster Malish & Cowan, LLP
1403 West Sixth Street
Austin, Texas 78703
(dPi Teleconnect, LLC)
(Electronic Mail)

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202
(dPi Teleconnect, LLC)
(Electronic Mail)



Nyla M. Laney

DM5 #709797